

REMARKS

The Action mailed on November 2, 2004 rejects claim 1 under 35 USC § 112 and claims 1-31 under 35 USC § 102(e) over U.S. Patent No. 6,717,573 to Shahoian et. al (“Shahoian”). The action asserts that Shahoian discloses all elements of the pending claims. Applicant respectfully disagrees.

Amended Claim 1 Satisfies § 112

Claim 1 is amended to obviate the § 112 rejections. No new matter is added. The Action asserts that the terms “the identification” and “the user interface command” in the interface process element of claim 1 lack sufficient antecedent basis. Amended claim 1 now recites:

an interface process for comparing properties of the detected movement to properties of a set of predefined movements associated with a set of user interface commands for manipulating and viewing documents *to identify a user interface command* to alter the image input by a user, *the identification of the user interface command* being independent of visible elements on the display.

(Emphasis added) Thus, “the identification” and the “user interface command” find antecedent basis on the immediately preceding clause, “to identify a user interface command.”

The Action further asserts that the term “rendered portion” lacks sufficient antecedent basis. Claim 1 is amended such that claim 1 recites: “a navigation module for navigating through the digital representation of the document by changing the rendered *image* in response to an identification by the interface process of an inputted user interface command.” (Emphasis added). The term “rendered image” finds antecedent basis in the rendering engine element of the claim.

Applicant therefore request reconsideration and withdrawal of the § 112 rejection to claim 1.

Claim 1 Patentably Distinguishes Over Shahoian

Claim 1 recites a display monitor for detecting movement of an object across a display and an interface process for identifying a user interface command to alter an image independent of visible elements on the display and based on the movement detected by the display monitor. The Action identifies three commands related to the use of a haptic mouse described in Shahoian in an attempt to illustrate the display monitor and interface process: 1) a command to reorder displayed windows, 2) a command to vibrate a mouse, and 3) a command to move a controlled

object. Office Action, p. 3. These illustrated commands and the processes that detect the input thereof, fail to teach or suggest an interface process that identifies any of these commands independent of visible elements on the display and based on detected movement of an object across the display. Thus, Shahoian fails to teach or suggest the interface process recited in claim 1.

The first command identification in Shahoian relied upon in the Action relates to the reordering of windows on a display. Shahoian's process identifies the reordering command by detecting a user's depression of a mouse button while a cursor is located in a blank region of a displayed window. Column 21, lines 26—43 and column 22, lines 9—24. This identification fails to take into account movement of an object across the display, as recited in claim 1. Instead the identification relies upon detecting the depression of a mouse button.

The second command identified by the Action includes the vibration of a mouse. Shahoian describes vibrating a mouse in response to a user dragging an icon or object across a display with a cursor. Column 20, lines 36—45. Identification of the vibration command depends upon visible elements on the display, i.e., the icon or object. However, such dependence on a visible element is specifically excluded in claim 1. Thus, Shahoian's process for detecting and initiating the mouse vibration command also fails to teach or suggest the subject matter recited in claim 1.

The third command the Action relies upon in rejecting claim 1 includes instructions to move a controlled object, such as a cursor, across a display. Column 11, lines 4—18. Shahoian describes identifying such instructions in response to detecting rotation of, or application of inertial forces to a mouse that “rests on a ground surface 22 such as a table top or mouse pad. A user grasps the mouse 12 and moves the mouse in a planar workspace on the surface 22.” Column 4, lines 55-57. That is, the process in Shahoian that identifies this instruction bases its identification on movement of a mouse across surface 22, not across a display as recited in claim 1.

Thus, Shahoian fails to teach or suggest an interface process for detecting a user interface command independent of visible elements on a display and based on detected movement across the display, as recited in claim 1. Therefore, Applicant requests the Examiner reconsider and withdraw the §102 rejection of claim 1. Claims 2–31 depend from claim 1 and add further

limitations, thereon. Applicant therefore requests the Examiner reconsider and withdraw the §102 rejections of claims 2-31.

In view of the above, each of the presently pending claims in this application is believed to be in immediate condition for allowance. Accordingly, the Examiner is respectfully requested to pass this application to issue.

Applicant believes no fee is due with this response. However, if a fee is due, please charge our Deposit Account No. 18-1945, under Order No. PGLD-P01-003 from which the undersigned is authorized to draw.

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Respectfully submitted,

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